

BPS TELEPHONE COMPANY P.O. BOX 550 BERNIE, MO 63822-0550

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(573) 293-2BPS (2277)

ax (573) 293-2299

May 23, 2006

To: Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

DOCKET FILE COPY ORIGINAL

445 - 12th Street, SW Washington, DC 20554

Karen Majcher

Vice President – High Cost & Low Income Division

Universal Service Administrative Company

2000 L Street, NW, Suite 200 Washington, D.C. 20036

Re:

CC Docket No. 96-45

Interstate Common Line Support - ICLS

Annual Certification Filing

This is to certify that BPS Telephone Company will use its Interstate Common Line Support - ICLS only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below:

ICLS

Company Name	State	Study Area Code
BPS Telephone Company	Missouri	42-0463

Signature of Authorized Representative

Date: May 23, 2006

Lisa Winberry

Printed Name of Authorized Representative

<u>Manager</u>

Title of Authorized Representative

Carrier's Name:

Carrier's Address

BPS Telephone Companyo. of Copies rec'd ListABCDE

120 Stewart Street Bernie, MO 63822

Carrier's Telephone Number

573-293-2277



BRETTON WOODS TELEPHONE COMPANY

MOUNT WASHINGTON PLACE, BRETTON WOODS, N.H. 03575 • (603) 278-9911 • FAX (603) 278-9913

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May 24, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 – 12th Street, SW Washington, DC 20554

Irene M. Flannery
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, N.W. Suite 200
Washington, DC 20036

RE: CC Docket No. 96-45

Interstate Common Line Support and Long Term Support – ICLS

Annual Certification Filing

This is to certify that Bretton Woods Telephone Company, Inc. will use its Interstate Common Line Support and Long Term Support – ICLS only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area listed below:

Company Name	State	Study Area Number
Bretton Woods Telephone Co., Inc.	New Hampshire	120038

1 Jaren X

Ms. Karen Wante

VP Operations

Signed

Bretton Woods Telephone Company, Inc.

171 Mt. Washington Hotel Rd.

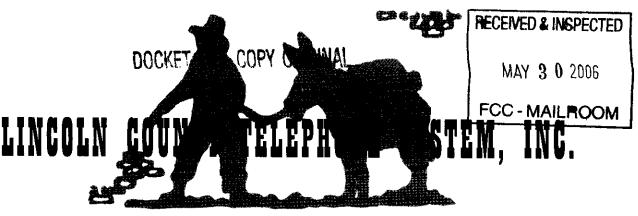
Bretton Woods, NH 03575

603-278-9911 Voice

603-278-9913 Fax

Certification Date

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JOHN W. CHRISTIAN, III President

P.O. Box 150 Pioche, Nevada 89043 PAUL W. CHRISTIAN Vice President

May 24, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: CC Docket No. 96-45

Interstate Common Line Support and Long Term Support - ICLS

Annual Certification Filing

Dear Ms. Dortch:

This is to certify that Lincoln County Telephone System, Inc., will use its Interstate Common Line Support and Long Term Support- ICLS only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is provided for study area 552351.

Sincerely,

John W. Christian President

JWC/ll

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May 24, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

[Title of Authorized Representative]

Karen Majcher Vice President – High Cost and Low Income Division Universal Service Administrative Company 2000 L Street, NW, Suite 200 Washington, DC 20036

Re:

Interstate Common Line Support and Long Term Support

Annual Certification Filing CC Docket No. 96-45

This is to certify that Rural Telephone Company will use its *Interstate Common Line Support and Long Term Support* only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below:

Company Name	State	Study Area Code
Rural Telephone Company	ID	472233
Rural Telephone Company	NV	552233

·	
(If necessary, attach a separate list of additional st	udy areas and check this box.)
M/M	May 24, 2006
Signature of Authorized Representative	<u>May 24, 2006</u> Date
Mark R. Martell	
[Printed Name of Authorized Representative]	
Administrative Manager	,

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SHARON MITCHELL

610 FIRE TOWER RD, RICHLANDS, North Carolina 28574-8166

May 15, 2006 06:21 PM

Representative Walter Jones U.S. House of Representatives 422 Cannon House Office Building Washington, DC 20515-0001

Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Representative Jones:

As someone who is concerned about increased taxes and telephone fees, I oppose Federal Communications Commission (FCC) Chairman Kevin J. Martin's plans to change the way monies are collected for the Universal Service Fund.

Chairman Martin is proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me -- and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -- students, prepaid wireless users, senior citizens and low-income residential and rural consumers -- is unfair. I urge Chairman Martin to rethink his flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Please pass along my concerns to the FCC on my behalf, letting them know that your constituents have contacted you to oppose a USF numbers or flat-fee plan. Thank you for your continued work. I look forward to hearing about your position on this matter.

Sincerely,

SHARON MITCHELL

cc:

FCC General Email Box

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Lisa Scott

4106 Madison St. NE, Columbia Heights, Minnesota 55421

May 10, 2006 11:20 AM

Senator Norm Coleman U.S. Senate 320 Hart Senate Office Building Washington, DC 20510-0001

Subject: Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Senator Coleman:

As someone who is concerned about increased taxes and telephone fees, I oppose Federal Communications Commission (FCC) Chairman Kevin J. Martin's plans to change the way monies are collected for the Universal Service Fund.

Chairman Martin is proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me -- and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -- students, prepaid wireless users, senior citizens and low-income residential and rural consumers-- is unfair. I urge Chairman Martin to rethink his flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Please pass along my concerns to the FCC on my behalf, letting them know that your constituents have contacted you to oppose a USF numbers or flat-fee plan. Thank you for your continued work. I look forward to hearing about your position on this matter.

Sincerely, the sound λ is a substitution of the property of

Lisa Scott The and the second section is the second second

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CHAIRMANIKEVINIMARTH

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Gail McKee

FCC - MAILROOM

904 Finch Dr., South Bend, Indiana 46614-6805

May 17, 2006

FCC Chairman Kevin J. Martin 445 12th Street SW Washington, DC 20554

Subject: Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Chairman Martin:

As someone who is concerned about increased taxes and telephone fees, I strongly oppose your plans to change the way monies are collected for the Universal Service Fund.

Your proposal to change the Universal Service Fund (USF) collection methodology from a "payfor-what-you-use" system to a "monthly flat-fee" would result in forced phone bill hikes for me - and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -- students, prepaid wireless users, senior citizens and low-income residential and rural consumers-- is unfair. I urge you to rethink your flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Sincerely,

Gail McKee

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Debra Crone FCC - MAILROOM

P.O. Box 850, Burney, California 96013

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May 21, 2006 07:50 AM

Representative Wally Herger U.S. House of Representatives 2268 Rayburn House Office Building Washington, DC 20515-0001

Subject: Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Representative Herger:

As someone who is concerned about increased taxes and telephone fees, I oppose Federal Communications Commission (FCC) Chairman Kevin J. Martin's plans to change the way monies are collected for the Universal Service Fund.

Chairman Martin is proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me -- and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -students, prepaid wireless users, senior citizens and low-income residential and rural consumers-- is unfair. I urge Chairman Martin to rethink his flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Please pass along my concerns to the FCC on my behalf, letting them know that your constituents have contacted you to oppose a USF numbers or flat-fee plan. Thank you for your continued work. I look forward to hearing about your position on this matter.

Sincerely,

Khoha (wone Debra Crone

cc:

FCC General Email Box

David A. Mayer CISA

36 Cervantes Blvd San Francisco, CA 94123-1618

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May 19, 2006

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FCC

Chairman Kevin J Martin 445 12th St SW, Washington, DC, 20554

Dear Mr. Martin:

As someone who is concerned about increased taxes and telephone fees, I oppose Federal Communications Commission (FCC) Chairman Kevin J. Martin's plans to change the way monies are collected for the Universal Service Fund.

Chairman Martin is proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me — and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users — like big businesses — and placing the weight on low-volume users — students, prepaid wireless users, senior citizens and low-income residential and rural consumers— is unfair. I urge Chairman Martin to rethink his flat-fee plan. It is a defacto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Please pass along my concerns to the FCC on my behalf, letting them know that your constituents have contacted you to oppose a USF numbers or flat-fee plan. Thank you for your continued work. I look forward to hearing about your position on this matter.

Sincerely,

David A. Mayer CISA

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MAY 3 0 2006

Charles D. Wingert

FCC - MAILSOOM

3602 Reiland St, Pittsburgh, Pennsylvania 15227-1146

May 11, 2006 05:16 PM

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FCC, Chairman Kevin J Martin 445 12th St SW Washington, DC, 20554

cc:

Senator Arlen Specter

U.S. Senate

711 Hart Senate Office

Building

Washington, DC 20510-0001

Senator Rick Santorum

U.S. Senate

511 Dirksen Senate Office

Building

Washington, DC 20510-0001

Representative Tim Murphy

U.S. House of Representatives

322 Cannon House Office

Building

Washington, DC 20515-001

Subject: Your FCC Proposal for a Flat Tax for Cell Phone Use Could Make Republicans Vote Democratic

Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Chairman Martin:

I oppose Federal Communications Commission (FCC) proposal to change from a "pay-for-whatyou-use" system to a "monthly flat-fee." I pay Tracfone \$129 for one year of service and 400 minutes. I do not expect to use more than that number of minutes in the year. Thus, a flat fee that would increase my costs by 10 to 20 percent is ill-conceived and at best unfair.

A proposal like this makes me think that the Democrats may be right in complaining about tax plans that favor the rich.

Logic says that you should tax proportionally to the usage of the airways, not for the privilege of using them regardless of the amount of that usage. Please do not implement a flat tax, because I don't want to vote Democratic in the upcoming elections. And, don't string this out through the elections, because I will assume that you will implement a flat fee after the elections. Accordingly, absent a public rejection of the flat-fee by you I'll vote Democratic for the first time, and I'll let any remaining Republicans know that I did so and why.

Charles D. Wingert

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MAY 3 0 2006

FCC - MAILROOM

Lois S. Elg 11 Tudor Hill Road Sussex, NJ 07461 DOCKET FILE COPY ORIGINAL

avind

May 19, 2006

FCC Chairman Kevin J. Martin 445 12th St. SW Washington, DC 20554

Dear Chairman Martin:

As someone who is concerned about increased taxes and telephone fees, I oppose the Federal Communications Commission's (FCC) plans to change the way monies are collected for the Universal Service Fund.

You are proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me -- and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -- students, prepaid wireless users, senior citizens and low-income residential and rural consumers-- is unfair. As a senior citizen on a limited income, I urge you to rethink this flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

I look forward to hearing about your position on this matter.

Sincerely,

Lois S. Elg

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MAY 3 0 2006

Bonnie Beaver

63 Box Pond Drive, Bellingham, Massachusetts 02019 - MAILROOM

May 13, 2006 07:39 AM

Representative Richard Neal U.S. House of Representatives 2266 Rayburn House Office Building Washington, DC 20515-0001

Subject: Re: Federal-State Joint Board on Universal Service CC Docket 96-45

Dear Representative Neal:

As someone who is concerned about increased taxes and telephone fees, I oppose Federal Communications Commission (FCC) Chairman Kevin J. Martin's plans to change the way monies are collected for the Universal Service Fund.

Chairman Martin is proposing a change in the Universal Service Fund (USF) collection methodology from a "pay-for-what-you-use" system to a "monthly flat-fee." The flat-fee system would result in forced phone bill hikes for me -- and for millions of low-volume, long-distance users in the U.S. Shifting the funding burden of the USF away from high volume users -- like big businesses -- and placing the weight on low-volume users -students, prepaid wireless users, senior citizens and low-income residential and rural consumers-- is unfair. I urge Chairman Martin to rethink his flat-fee plan. It is a de-facto tax increase of as much as \$707 million for 43 million of low-volume, long-distance users in the U.S.

Please pass along my concerns to the FCC on my behalf, letting them know that your constituents have contacted you to oppose a USF numbers or flat-fee plan. Thank you for your continued work. I look forward to hearing about your position on this matter.

cc: CHAIRMAN Kerin & Martin

FCC General Email Box

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May 24, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Karen Majcher Vice President – High Cost and Low Income Division Universal Service Administrative Company 2000 L Street, NW, Suite 200 Washington, DC 20036

Re: Interstate Common Line Support and Long Term Support

Annual Certification Filing CC Docket No. 96-45

This is to certify that Nehalem Telecommunications, Inc. will use its *Interstate Common Line Support* and *Long Term Support* only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below:

Company Name	State	Study Area Code
Nehalem Telecommunications, Inc.	OR	532387

(If necessary, attach a separate list of additional study are Signature of Authorized Representative	May 24, 2006 Date
Mark R. Martell [Printed Name of Authorized Representative]	
Administrative Manager [Title of Authorized Representative]	No. of Copies rec'd <i>0</i> List ABCDE

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GLENNS FERRY, IDAHO 83628 FCC - MAILROOM 892 W. MADISON AVE. (208) 366-2840 • FAX (208) 366-26T5

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May 24, 2006

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Karen Maicher Vice President - High Cost and Low Income Division Universal Service Administrative Company 2000 L Street, NW, Suite 200 Washington, DC 20036

Re:

Interstate Common Line Support and Long Term Support

Annual Certification Filing CC Docket No. 96-45

This is to certify that Pend Oreille Telephone Company will use its Interstate Common Line Support and Long Term Support only for the provision, maintenance, and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study area(s) listed below:

Company Name	State	Study Area Code
Pend Oreille Telephone Company	WA	522418
		

(If necessary, attach a separate list of additional st	udy areas and check this box.)
Signature of Authorized Representative	
Wale Mark	May 24, 2006
Signature of Authorized Representative	Date

Mark R. Martell [Printed Name of Authorized Representative]

Administrative Manager [Title of Authorized Representative] No. of Copies recid List ABCDE

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May 24, 2006 DOCKET FILE COPY ORIGINAL

Ex Parte Presentation Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

The University at Albany, a State University of New York University Center submits this letter to express our concerns that a number-based contribution mechanism would have a significant detrimental effect on this campus and ultimately its students, faculty and staff.

We have determined that our per-year federal universal service obligation would increase from \$4,800.00 per year to over \$235,056.00 per year if a number-based approach were adopted, assuming that the per-number fee was \$1.00.

This increase and resultant activity to avoid this increase would put in jeopardy the architecture of the University's lifeblood communications system of 15 PBX's. It would prohibit the direct access to faculty, staff and students without operator assistance. Changing our architecture that has been updated over the past twelve years to a non-DID based system would mean expending ten's of thousands of dollars in programming, hardware and software changes.

Our daily business practices and procedures would have to be modified, including our many ACD systems, 911 databases, interactive directory, printed directory, directory assistance from our LEC, automated voice response directory system, and billing modules that are all based on DID numbering.

All material in print and electronic form on thousands of forms, letterheads, fliers, business cards, etc. and the thousands of web and electronic files would have to be changed. One cannot even estimate the cost of those changes alone.

Our system is designed to have one switchboard operator. Returning to a one number system would mean the addition of at least six new positions that the University cannot fund. Our budget is constrained by the budget of the State of New York and affordable tuition; we simply cannot just increase our budget to meet this new requirement.

UAB 400 1400 Washington Avenue Albany, New York 12222 PH: 518-437-4920 www.albany.edu/its No. of Copies rec'd 0 List ABCDE The University at Albany does not have resources to offset this substantial increase. If implemented, the FCC's action would require significant cuts with respect to institutional programs, including, but not limited to,

- the elimination of individual telephone service for resident students.
- the elimination of numbers assigned to professors and researchers operating in multiple locations, thereby limiting their access to students and their research.
- the reconfiguration of the campus communications system to an extension-based system under which the university would maintain a single call-in number.
- the shift in policy with respect to maintaining number blocks would significantly impact campus telecommunications planning (and pose potential public safety concerns) with the elimination of the traditional five-digit dialing on our three campuses.
- the reallocation of funding from education and research-based programs to funding the Universal Service Fund fee.
- the elimination of efforts to upgrade the University's telecommunications facilities and limiting our ability to invest in research networks such as NYSERNet, Internet2, and the National Lambda Rail.

The Commission should recognize that enterprise customers include, not only Fortune 500 companies, but also many not-for-profit organizations, including colleges and universities, local and state governments, charitable organizations, and medical institutions. These entities also do not have the resources to internalize significant increases in regulatory fees.

We are particularly concerned with any reform that requires enterprise customers to shoulder a heavier universal service burden than they do today in comparison to residential customers. The FCC should reject any efforts to establish a residual funding mechanism under which enterprise customers are responsible for all funding above a certain per-number fee for residential customers.

The Act requires universal service contributions to be equitable, yet based on the current record in this proceeding; it remains unclear if a pure number-based approach could fully satisfy this basic requirement of Section 254.

We fully support the goals of universal service, and commend the FCC for their efforts to extend telecommunications services to all Americans. It is, nevertheless, essential that the Commission also address universal service distribution issues by controlling future fund growth and limiting any waste within the program.

The contribution factor for the universal service program has been stable for the last three quarters, which calls into question the need for immediate reform of the current revenue-based approach.

We have further concerns with how non-number-based services, including special access services, would be assessed under a number-based approach, particularly with respect to double billing. Because many special access services already have associated numbers, there is no basis to separately assess special access services in addition to working numbers.

It is our understanding that advanced data services for residential customers (DSL and cable modem service) are exempt from universal service obligations. The same exemption should apply equally to enterprise data services and special access services.

The University at Albany asks the FCC to proceed with caution in adopting a number-based plan that does not account for the specific concerns of the higher education community.

The University at Albany believes that any reform in this proceeding should not substantially disadvantage any particular class of customers, including higher education.

The University at Albany hopes the Commission modifies its universal service policies in a manner that reflects the potential impact on the higher education community.

We suggest that no reform proposals be formally adopted by the Commission until such time as to the full impact of those proposals is studied and understood.

Respectfully submitted,

Christine CHaile

Christine E. Haile

Chief Information Officer